

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Competitive Product Prices
Global Expedited Package Services 3 (MC2010-28)
Negotiated Service Agreement

Docket No. CP2015-143

PUBLIC REPRESENTATIVE COMMENTS ON
POSTAL SERVICE NOTICE CONCERNING MODIFICATION TO
GLOBAL EXPEDITED PACKAGE SERVICES 3
NEGOTIATED SERVICE AGREEMENT

(April 7, 2016)

I. INTRODUCTION

The Public Representative hereby provides comments pursuant to Order No. 3204.¹ In that Order, the Commission reopens the above referenced docket to receive comments from interested persons, including the undersigned Public Representative, on a Postal Service Notice of filing a modification to Global Expedited Package Services 3 (GEPS 3) Negotiated Service Agreement (Agreement).²

The Commission approved the original GEPS 3 contract in Order No. 2745, dated October 7, 2015.³ On March 30, 2016, the Postal Service filed a Notice that it had agreed to a modification to the existing GEPS 3 negotiated service agreement subject of the current docket (Modification). To support the Notice, the Postal Service

¹ Notice and Order Concerning Modification to a Global Expedited Package Services 3 Negotiated Service Agreement, March 31, 2016 (Order).

² Notice of the United States Postal Service of Filing Modification Two to Global Expedited Package Services 3 Negotiated Service Agreement, March 30, 2016 (Notice).

³ Order Approving Additional Global Expedited Package Services 3 Negotiated Service Agreement, October 7, 2015 (Order No. 2745). See *also*: Notice of the United States Postal Service of Filing a Functionally Equivalent Global Expedited Package Services 3 Negotiated Service Agreement and Application for Non-Public Treatment of Materials Filed under Seal, September 24, 2015.

filed certified statement of compliance with 39 U.S.C. § 3633(a), a redacted copy of the Modification and redacted versions of the revised supporting financial documents. In addition, the Postal Service filed (under seal) the unredacted Modification and unredacted financial documentation.

The Modification revises the customer's minimum commitment and Annex 1. *Notice* at 1. The rates in the Modification are intended to become effective on April 15, 2016 after receiving the approval. *Id.*

II. COMMENTS

The Public Representative has reviewed the Postal Service's Notice, the original and modified GEPS 3 contract, and the supporting financial model filed under seal. Based upon that review, the Public Representative concludes that the modified contract continues to be functionally equivalent to the baseline agreement. In addition, it appears that the negotiated prices in the modified contract should generate sufficient revenue to cover costs. However, the Public Representative has a concern described below.

The Public Representative respectfully submits the foregoing comments for the Commission's consideration.

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